



40 Broad Street, 7th Floor
New York, NY 10004
Tel. (212) 943-9080
Fax (212) 943-9082

Adrianna R. Grancio
Partner
agrancio@vandallp.com

May 20, 2024

VIA ECF

Hon. Peggy Kuo, U.S.M.J.
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *Trustees of the Plumbers Local No. 1 Welfare Fund et al. v. Spray in Place Solutions, Inc.*, 24 CV 2568 (KAM)(PK)

Dear Judge Kuo,

This firm represents the Plaintiffs in the above-referenced case. We write in connection with your Honor's May 20, 2024 Order directing Plaintiffs to file a status report indicating how they intend to proceed in light of the expiration of Defendant Spray in Place Solutions, Inc. ("SIPS") and Defendant Atlantic Specialty Insurance Company's ("ASIC," together with SIPS, the "Defendants") time to answer the complaint.

On April 29, 2024, counsel for the Defendants, Mr. Emanuel Kataev, Esq., of Sage Legal LLC, contacted the undersigned and requested an extension of time for Defendants to answer the complaint. On May 1, 2024, the undersigned informed Mr. Kataev that Plaintiffs consented to an extension of Defendants' time to answer the complaint through and including May 24, 2024. On May 4, 2024, Mr. Kataev informed the undersigned that he "plan[s] to file a consent letter motion late this week or early the following week." Although counsel failed to file a consent letter motion with the Court, Plaintiffs will honor the extension date of May 24, 2024. If Defendants do not answer or otherwise respond to the complaint by that date, Plaintiffs will promptly seek certificates of default against the Defendants and proceed with a motion for default judgment.

We thank the Court for its time and attention to this matter.



Respectfully submitted,

/s/
Adrianna R. Grancio, Esq.
Attorneys for Plaintiffs

cc: Emanuel Kataev, Esq. (*via e-mail*)
Counsel for Defendants